## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

## **Greenbelt Division**

CHARTIS PROPERTY CASUALTY	*	
COMPANY	*	
Plaintiff	*	CASE NO.: 13-CV-01479-DKC
V.	*	
GEORGE W. HUGUELY V, et al.		
Defendants	*	
	*	
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## ANSWER TO MOTION TO LIFT STAY AND REOPEN CASE

Now comes Sharon D. Love, Administrator of the Estate of Yeardley R. Love, and in Answer to the Second Motion to Lift Stay and Reopen Case, says:

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Admitted.
- 8. Admitted.
- 9. Admitted.
- 10. Admitted.
- 11. Admitted.

- 12. Denied.
- 13. Admitted. It should be noted by the Court that the Order signed by Judge Moore of the Circuit Court for the City of Charlottesville was not entered until November 6, 2015. It is denied that Chartis will incur substantial costs and expenses in connection with Huguely's defense, inasmuch as said fact is irrelevant to the fact that Chartis is obligated to provide defense to Mr. Huguely.
  - 14. Admitted.
  - 15. Admitted.
  - 16. Denied that there is prejudice to Chartis.

In further answer to the Motion to Lift Stay and Reopen Case, Sharon D. Love,
Administrator of the Estate of Yeardley R. Love, concurs with Chartis' request to lift the stay and
reopen case so that this case can proceed to final judgment.

WHEREFORE, having fully answered the Motion to Lift Stay and Reopen Case, Sharon D. Love, Administrator of the Estate of Yeardley R. Love, requests this Honorable Court:

(1) Lift the stay currently imposed in this case; (2) Order the Clerk to administratively reopen this case; and (3) Order such further and additional relief that the Court deems appropriate.

/s/ Paul D. Bekman
PAUL D. BEKMAN
EMILY C. MALARKEY
Salsbury, Clements, Bekman, Marder
& Adkins, L.L.C.
300 West Pratt Street, Suite 450
Baltimore, Maryland 21201
(410) 539-6633

Counsel for Interested Party, Sharon D. Love, Administrator of the Estate of Yeardley R. Love

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 23, 2015, copies of the foregoing Answer to

Motion to Lift Stay and Reopen Case were served electronically through CM/ECF on:

Richard J. Berwanger, Jr., Esquire Stacey A. Moffet, Esquire Eccleston & Wolfe, P.C. Baltimore-Washington Law center 7240 Parkway Drive, 4<sup>th</sup> Floor Hanover, MD 21076-1378 Attorneys for Plaintiff, Chartis Property Casualty Company

Peter C. Grenier, Esquire Grenier Law Group, PLLC 1400 L Street, NW, Suite 420 Washington, DC 20005 Attorney for Defendant, George W. Huguely, V, and Interested Parties, Andrew and Marta Murphy

/s/ Paul D. Bekman